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8 Attorneys for Defendant
9 RITE AID CORPORATION

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA

12 KIMBERLY BEAGLE,
13 Plaintiff,

14 vs.

15 RITE AID CORPORATION; and DOES
16 1 TO 100, INCLUSIVE,
17 Defendants.

Case No.: CV08-1517-PJH

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND THE EXPERT
DISCOVERY CUT-OFF**

18 Plaintiff Kimberly Beagle and Defendant Rite Aid Corporation, by and
19 through their counsel of record, hereby stipulate to the following:

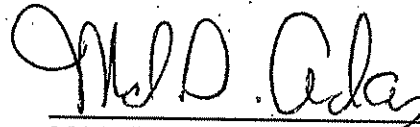
- 20 1. The parties agree to extend the expert discovery cut-off, presently
21 ordered for August 31, 2009, to October 16, 2009.
- 22 2. The Court will hear Rite Aid's motion for summary judgment on
23 September 16, 2009.
- 24 3. Both sides have disclosed expert witnesses.
- 25 4. Trial in this case is set for January 25, 2010.
- 26 5. Good cause supports the extension of the expert discovery cut-off to
27 October 16, 2009. With the current expert discovery cut-off date, the parties
28 would need to depose each other's expert witness prior to the ruling on the

1 motion for summary judgment. Furthermore, on August 12, 2009, the parties
2 exchanged lengthy reports by their experts; with the present expert discovery
3 cut-off date, the parties would need to study the reports in preparation for the
4 depositions while at the same time focusing on the pending summary judgment
5 motion. Extending the cut-off to October 16, 2009 still gives the parties more
6 than three months to prepare for trial and allows counsel to depose the experts
7 after the summary judgment motion.

8 IT IS SO STIPULATED.

9 DATED: August 26, 2009

MAYALL, HURLEY, KNUTSEN,
SMITH & GREEN

11 

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13 MARK S. ADAMS
14 KIMBERLY WILLY
15 Attorneys for Plaintiff
KIMBERLY BEAGLE

16 DATED: August 24, 2009

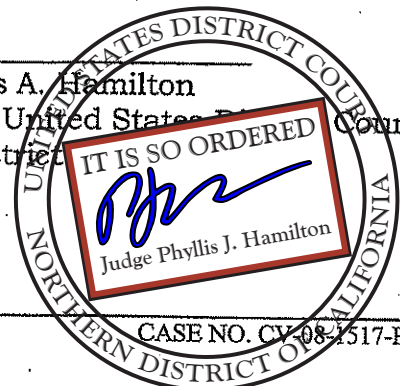
KELLY, HOCKEL & KLEIN P.C.

17
18 /s/ Annmarie M. Liermann
19 JONATHAN ALLAN KLEIN
20 ANNMARIE M. LIERMANN
Attorneys for Defendant
RITE AID CORPORATION

21 IT IS SO ORDERED that the expert discovery cut-off of August 31,
22 2009 is hereby extended to October 16, 2009.

23
24
25 DATED: 8/31/09

26 Judge Phyllis A. Hamilton
27 Judge of the United States District Court,
28 Northern District of California



STIPULATION AND PROPOSED ORDER
TO EXTEND EXPERT DISCOVERY CUT-OFF

CASE NO. CV 08-1517-PJH